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August 15, 2024

VIA ECF

Honorable Barbara C. Moses
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED. SO ORDERED.



Barbara Moses
United States Magistrate Judge
August 15, 2024

Re: *Krell v. Commissioner of Social Security*
Civil Action No. 1:24-cv-03939-BCM

Dear Judge Moses,

We write on behalf of our client, Steven Michael Krell, with the consent of the defense, to request additional time to file his motion for judgment on the pleadings which is currently due on August 21, 2024 per the Court's May 22, 2024 Standing Order. This is the parties' first request for an extension. The reason for this request is that Plaintiff's counsel currently is recovering from surgery.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file his motion for judgment on the pleadings on or before: **November 19, 2024;**
- Defendant to file its response to plaintiff's motion/cross motion on or before: **January 20, 2025;** and
- Plaintiff to file his reply, if any, on or before: **February 3, 2025.**

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Fergus John Kaiser, Esq. (by ECF)